

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

Sheyla Dearcia,

Plaintiff,

vs.

Majha Block Xpress,

Defendants.

Case No. 2:24-cv-03484-RMG

**JOINT DISCOVERY PLAN  
PURSUANT TO RULE 26(f)(3)**

Plaintiff and Defendant, by and through their respective undersigned attorneys, hereby respectfully submit this report as required by Fed. R. Civ. P. 26(f)(3):

**A. What changes should be made in the timing, form, or requirement for disclosures under Rule 26(a), including a statement as to when disclosures under Rule 26(a)(1) were made or will be made:**

The parties had no changes to the timing, form or requirement for the Rule 26(a) initial disclosures.

**B. The subjects on which discovery may be needed, when discovery should be completed, and whether discovery should be conducted in phases or be limited to or focused upon particular issues:**

The parties agree that discovery will be needed on the following subjects: liability, causation, and damages. The parties agree that discovery should be completed in accordance with the proposed Consent Amended Scheduling Order contemporaneously submitted herewith to chambers and further agree it is not necessary for discovery to be conducted in phases or be limited to or focused upon particular issues.

**C. Any issues about disclosure or discovery of electronically stored information, including the form or forms in which it should be produced:**

At this time, there are no issues about disclosure or discovery of electronically stored information. The parties reserve the right to supplement this response and/or seek the assistance of the Court should any such issue arise in the future.

**D. Any issues about claims of privilege or of protection as trial-preparation materials, including – if the parties agree on a procedure to assert these claims after production-whether to ask the court to include their agreement in an order:**

There are no issues regarding claims of privilege or of protection as trial-preparation materials at this time. The parties acknowledge that such issues may arise in the future and, where appropriate, the parties will seek a consent order to resolve the issue. The parties reserve the right to supplement this response.

**E. What changes should be made in the limitations on discovery imposed under these rules or by local rule, and what other limitations should be imposed; and**

The parties presently agree that no limitations on discovery other than those already contained in the Federal Rules of Civil Procedure should be imposed.

**F. (F) Any other orders that should be entered by the court under Rule 26(c) or under Rule 16(b) and (c).**

The parties agree that additional time is needed to complete the tasks set forth in the Court's Conference and Scheduling Order (ECF 31) and hereby request that the Court amend the Scheduling Order to reflect the deadlines as set forth in the proposed Amended Scheduling Order contemporaneously submitted herewith to chambers.

Respectfully submitted,

**MORGAN & MORGAN P.A.**

S./Jonathan Graham

Jonathan Graham, Esquire, Fed. Bar No. 13969  
4401 Belle Oaks Drive, Suite 300, North  
Charleston, SC 29405

[jgraham@forthepeople.com](mailto:jgraham@forthepeople.com)

(843) 947-6063

*Attorney for the Plaintiff*

**WILSON, ELSER, MOSKOWITZ,  
EDELMA & DICKER LLP**

S./G. Robert DeLoach, III

G. Robert DeLoach, III, S.C. Federal Bar No. 13252  
227 West Trade Street, Suite 300  
Charlotte, NC 28202

[robert.deloach@wilsonelser.com](mailto:robert.deloach@wilsonelser.com)

(704) 302-1330

*Attorney for Defendant Majha Block Xpress*

May 6, 2025